
**TECHNICAL REVIEW DOCUMENT
FOR
RENEWAL OF OPERATING PERMIT 96OPWE125**

to be issued to:

Golden Aluminum, Inc.
Weld County
Source ID 1230089

Cathy Rhodes
January, 2004

I. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued November 1, 1999 and expires on November 1, 2004. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted October 30, 2003. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

II. Source Description

This source is classified as an aluminum sheet manufacturing facility which falls into the Standard Industrial Classification 3353. Golden Aluminum manufactures coiled aluminum sheet from aluminum scrap.

The facility is located in the city of Ft. Lupton in Weld County within an area designated as attainment for all criteria pollutants. This facility is within 100 km of one Class I area, Rocky Mountain National Park. There are no states within 50 miles.

Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential to Emit (tpy)</u>	<u>Actuals (tpy)</u>
PM/PM ₁₀	61.8	61.8
NOx	47.0	47.0
VOC	94.0	94.0
CO	34.0	34.0
HAPs	<25	10

Potential emissions are based on permit limits. The source chose to report actuals as potential in the most recent APENs filed with the Division.

II. Discussion of Modifications Made

Source Requested Modifications

The permittee requested the following revisions to the Operating Permit in their renewal application.

Information Page

Change permit issuance information, Responsible Official, and Facility Contact Person.

Section II

Condition 2.1: Emission factors and emission limits for PM, Metal HAPs, and HCl are revised to reflect stack test results.

Condition 2.1.4 is removed. The required tests have been completed.

Condition 2.7 is removed. The required deadlines have been met.

Condition 5.2 – Throughput limit is reduced.

Condition 7.1 is revised to remove the pressure drop monitoring requirements.

Condition 9.1 is revised to remove the pressure drop monitoring requirements.

Condition 12.1 is removed. The compliance date has passed.

Condition 12.25 is removed, because the required initial performance test has been completed.

Other Modifications

This permit was recently modified on May 18, 2003, to include MACT requirements. Additional revisions were made at that time to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of the modification. The following additional modifications are made to the permit in order to address Compliance Assurance Monitoring (CAM) requirements.

The CAM provisions apply to units which use an add on control device to meet an emission limit, and for which precontrol emissions are greater than major source levels

(100 TPY criteria pollutants, 25/10 HAPs). The Division has determined that the following units are subject to the CAM provisions.

S001 – A bagfilter is used to control emissions from the shredders. The emission limit includes fugitive emissions, which are not controlled by an add-on control device. The permittee submitted information which indicates uncontrolled emissions (nonfugitive) do not exceed 100 tons/year PM/PM₁₀. The source is therefore not subject to CAM.

S002 – The bagfilter is subject to CAM for the HCl emission limit for the facility wide single HAP emission limit.

S006 – The bagfilter is subject to the CAM requirements for the PM emission limits and for the HAP emission limits.

S001 – Shredders use a bagfilter to control metal HAPs, however precontrolled emissions are not greater than 10 tons/year, therefore the shredder is not subject to CAM provisions for the facility wide HAP limits.

S002 – Delacquering Kiln uses a thermal oxidizer to control D/F emissions to meet the MACT emission limit. Control devices used to meet MACT standards are not subject to the CAM provisions.

S008 – Hot Mill and S010 – Cold Rolling Mill are equipped with air purifiers to control PM emissions. Based on a control efficiency of 90%, precontrolled emissions are less than the major source threshold, therefore CAM does not apply to these units.

S011 – Coating Line uses a thermal oxidizer to meet VOC and HAP emission limits. Under NSPS Subpart TT, the permit already requires continuous monitoring, therefore S011 is not subject to the CAM provisions.

Section I

Condition 6 is revised to list units at the source subject to the CAM requirements.

Section II

Condition 13 is added to set forth CAM provisions.

Appendices B and C

Incorporate Division's latest versions.

Appendix H

Division policy no longer requires the inclusion of the full MACT standard. Appendix H now contains the CAM plan..